

**COMMONWEALTH OF MASSACHUSETTS**  
**before the**  
**DEPARTMENT OF PUBLIC UTILITIES**

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Massachusetts Electric Company )  
Nantucket Electric Company )  
New England Power Company )

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**Docket No. 96-25**

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**MOTION TO INTERVENE**

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American Tractebel-CRSS, Inc. ("ATC") requests to intervene in the above entitled proceeding, pursuant to 220CMR 1.03. In support of this motion ATC states as follows:

1. ATC is a national developer of independent power projects whose address is:

American Tractebel-CRSS, Inc.  
c/o CRSS, Inc.  
Suite 900  
1177 West Loop South  
Houston, TX 77027-2427

2. In this proceeding, the Department of Public Utilities (DPU) will review a settlement agreement (the "Agreement") between the Commonwealth of Massachusetts (the "Commonwealth") and the following operating companies of the New England Electric System: Massachusetts Electric Company, Nantucket Electric Company and New England Power Company (collectively the "NEES Companies").

3. ATC participated in the negotiations between the Commonwealth and the NEES companies and was a signatory to the Agreement. ATC supports the Agreement and requests that the DPU approve the Agreement because it is a positive step forward in the restructuring of the electric utility industry in Massachusetts.

4. ATC's interests will be substantially affected by this proceeding because this proceeding will review the Agreement which ATC participated in negotiating and to which ATC is a signatory.

WHEREFORE, American Tractebel-CRSS, Inc. requests the Department of Public Utilities grant this Motion to Intervene.

Respectfully submitted,

American Tractebel-CRSS, Inc.

By Its Attorneys

BROWN, OLSON & WILSON, P.C.

By \_\_\_\_\_  
Peter W. Brown, Esquire  
501 South Street  
Concord, NH 03304  
(603) 225-9716

Dated: October 29, 1996

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was this day served via U.S. Mail, first class, postage prepared to all of the parties on the attached service list.

Dated: October 29, 1996

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Peter W. Brown, Esquire